REMARKS/ARGUMENTS

The Examiner has rejected claims 1-9 under 35 U.S.C. § 102(e) as being anticipated by the disclosure of Davis et al. (U.S. Patent no. 6,578,013). Applicant requests that the Examiner reconsider the rejection of claims 1-9 in light of the following comments. Moreover, the newly submitted claims are novel and non-obvious in view of the relied on art. For the following reasons, Applicant requests that the Examiner withdraw the rejections and allow the pending claims.

Rejection under 35 U.S.C. § 102(e)

It is well established that a claim is anticipated under 35 U.S.C. § 102 only if the identical invention is shown in complete detail as defined by the claim. *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989). As the following will demonstrate, the rejected claims contain subject matter not disclosed or suggested by U.S. Patent no. 6,578,013.

U.S. Patent 6,578,013 relates to generation of a compatible order for a computer system. Thus, in supplier database 610, supplier administrator 502 maintains records of configuration for various computing systems (e.g., clients 202, 204 and 206) owned or leased by customers (e.g. customer 102) (see col. 14, lines 15-21, Figs. 7, 8a, 8b).

Supplier administrator 502 automatically identifies situations in which new improved items (e.g., software upgrades, additional electronic circuitry, peripheral hardware devices) become available for compatible installation at customers' existing computing systems. In response to identifying such situations, supplier administrator 502 automatically outputs messages to customers (e.g., to customer administrator 214 via network 110) for describing the situations. In that manner, supplier administrator 502 automatically prompts the customers to order items from supplier 112 (see col. 14, lines 22-34).

However, Davis et al. is completely silent on how the supplier administrator determines whether or not such a new item is suitable for compatible installation as claimed by Applicant. Similarly, Davis et al. does not provide any description as to how the supplier administrators handle multiple suppliers/manufacturers. The absence of any such descriptions in Davis et al suggests that Davis et al. would rely on the prior art methods of cataloguing items provided by different manufacturers. Therefore, the cited document is largely irrelevant in the context of the data management system invention of the Applicants.

In this regard, a system of the claimed invention takes identification information of a plurality of components from each supplier and includes a list of compatible vehicles with the details of each component. The components may be grouped under a generic component name and then sorted into compatibility groups according to the vehicles with which they are compatible. The vehicle compatibility information is supplied by a coordinator to each supplier.

In this way, it is possible to search for interchangeable parts for a specific vehicle. This has not been possible in current systems, because each supplier uses its own data structure, media, format and codes. Davis on the other hand is concerned with the components of only one supplier and does not include the equivalent of the compatibility grouping of components and end user computers to provide a list of interchangeable components.

Furthermore, as previously noted, Applicants submit that the Examiner has attempted to equate suppliers/manufacturers claimed by Applicants with the customer database in Davis et al. Applicants respectfully suggest that such an attempt is improper because no prior art reference has been cited that teaches or

enables each of the claimed elements, arranged as in claims 1-9. For example, the Examiner states that "Davis et al. teaches creating and modifying data relating to components specific to that supplier…(see col. 2, lines 41-66)" as claimed in claim 1. This assertion is clearly wrong, as col. 2, lines 41-66 describe customers 102, 104, and 106 only.

In response to these comments, it is the Examiner's position that subject matter is "equivalent" in the reference. Thus, notwithstanding the propriety of such an equivalence determination at this stage, it is apparent that the Examiner is conceding that the related method claim limitations of at least claims 1-3, 7 and 8 are not disclosed in the reference in the complete detail as defined by the claims, which is required for a rejection under 102(e). Thus, a prima facia case of anticipation has not been presented and the rejection should be withdrawn.

Further, the suppliers/manufactures of computer items (e.g., DVDs, Zip drives, etc.) in Davis et al. neither export 'modified data portions' to the supplier administrators nor receive 'exported product identifiers' from the supplier administrator as claimed in claim 2. The supplier administrator in Davis et al. simply consolidates multiple customer records into a single customer database without any interaction with other suppliers/manufacturers of computer items.

Therefore, we submit that the Applicants' invention is not anticipated by the cited reference. Accordingly, it is respectfully submitted that the application presents novel and non-obvious subject matter and is in condition for allowance. Early and favorable allowance is requested.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is

respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue.

If, however, for any reason the Examiner does not believe that such action can be taken at this time, it is respectfully requested that he/she telephone applicant's attorney at (908) 654-5000 in order to overcome any additional objections which he might have.

If there are any additional charges in connection with this requested amendment, the Examiner is authorized to charge Deposit Account No. 12-1095 therefor.

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Respectfully submitted,

By _____

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